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Traub & Traub, P.C.

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Judge Kenneth M. Karas
United States Courthouse
300 Quarropas St.
White Plains, NY

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June 17, 2008

Re: USA v. Tarek Oun
06 CR 1118 (KMK)

BY ECF

MEMO ENDORSED

Dear Judge Karas:

The defendant Tarek Oun is requesting permission to travel to his home country, Egypt, from on or about July 20 to September 2, 2008. When Mr. Oun was released on bail, his travel was restricted to the Eastern and Southern Districts of New York and the states of Connecticut and New Jersey. He was required to surrender his passport and directed not to apply for a new one.

To my knowledge, Mr. Oun has been in compliance with the conditions of his release, including reporting by telephone to the Pretrial Services Agency.

If the Court approves Mr. Oun's request, his passport may have expired in the intervening time and would have to apply for a new one.

Accordingly, the defendant respectfully requests that the Court authorize the defendant's travel and the release of his passport, and, if necessary, permission to apply for a new passport.

AUSA John Zack informs me that the government has no objection to this request.

Thank you for your consideration of this request.

cc: AUSA John Zack
(by fax)

Very truly yours,

A handwritten signature in black ink, appearing to read "Joel M. Stein".

Joel M. Stein, Esq.
Counsel to defendant

Granted, as long as Mr. Oun provides 24-hour contact information while in Egypt and notifies the Government immediately upon his return.

So Ordered,
[Signature] 6/19/08